

Exhibit C

Schnake, Katherine G.

From: Richard P. Caro <rpc29@yahoo.com>
Sent: Wednesday, August 02, 2017 12:25 PM
To: Schnake, Katherine G.; Henderson, Matthew R.; Lucy Bednarek
Subject: Re: Privileged Documents
Attachments: Ex25.pdf; Ex24.pdf; Ex23.pdf; Ex22.pdf; Ex21.pdf; Ex20.pdf; Ex19.pdf; Ex18.pdf; Ex17.pdf; Ex16.pdf; Ex15.pdf; Ex14.pdf; Ex13.pdf; Ex12.pdf; Ex11.pdf; Ex10.pdf; Ex9.pdf; Ex8.pdf; Ex7.pdf; Ex6.pdf; Ex5.pdf; Ex4.pdf; Ex3.pdf; Ex2.pdf; Ex1.pdf

I have a short lunch break and am using it to send you the hard copy exhibits. You'll be able to include them electronically.

I doubt if I had the time now to go through the privilege log. Even if I did, I'd may not find them since those logs do not state that there was content disclosed. All the ones referenced in the privilege log did not have content disclosed at all in contrast to these 25. Those documents as disclosed were disclosed after review by R&S counsel, including Roselli. Brookforest is also not listed in your ledger so I doubt if that is in the Privilege Log.

So, here are the hard copies for these emails:

1. Wennstrom to Roselli	1/26/16	11:58 AM	GeoBee Test omitted
2. Brookforest to Voliva	1/19/16	1:28 PM	2 emails with omitted attachments
3. Voliva to Wennstrom	1/15/16	8:27 AM	
4. Wennstrom to Traub	1/20/16	12:25 PM	Copy of GeoBee Test Sent but omitted
5. Voliva to Wennstrom	1/18/16	7:03 PM	
6. Wennstrom to Voliva...	1/18/16	7:16 PM	
7. Voliva to Owen...	1/18/16	7:29 PM	
8. Wennstrom to Roselli	1/20/16	12:53 PM	
9. Wennstrom to Hanzlik & Chun	1/21/16	4:43 PM	2 attachments omitted
10. Wennstrom to Galvin	1/21/16	10:03 PM	
11. Traub to Wennstrom	1/22/16	2:22 PM	
12. Roselli to Wennstrom	1/22/16	8:00 PM	
13. Wennstrom to Roselli	1/22/16	9:01 PM	
14. Roselli to Wennstrom	1/22/16	9:15 PM	
15. Owen to Wennstrom	1/23/16	7:50 PM	
16. Wennstrom to Owen	1/23/16	8:44 PM	
17. Wennstrom to Owen	1/23/16	8:49 PM	
18. Wennstrom to Voliva & Owen	2/1/16	10:13 PM	
19. Wennstrom to Owen & Voliva	2/1/16	10:19 PM	GeoBee Test omitted
20. Massey to Roselli & Wennstrom	3/12/16	3:52 PM	
21. Massey to Hanzlik & Roselli	3/15/16	11:30 AM	
22. Massey to Hanzlik, Wennstrom...	3/16/16	2:15 PM	
23. Wennstrom to Galvin, Massey, Roselli	3/22/16	12:03 PM	
24. Massey to Hanzlik, Wennstrom & Roselli	3/24/16	6:35 PM	
25. Wennstrom to Massey	4/8/16	7:24 PM	Notes on Student interview - 1/19/16 omitted

As for the privilege documents, I gave you the list for each of the 3 groups and the total for each group. I may have miscounted, so I'll leave the final total number to you to state. I have to return to the hospital soon.

Richard

From: "Schnake, Katherine G." <KSchnake@hinshawlaw.com>
To: Richard P. Caro <rpc29@yahoo.com>
Cc: "Henderson, Matthew R." <mhenderson@hinshawlaw.com>; Lucy Bednarek <lbednarek@ancelglink.com>
Sent: Wednesday, August 2, 2017 8:10 AM
Subject: Re: Privileged Documents

Richard, we already discussed the index of produced documents. It is no longer valid - I'm not even sure those are still valid bates numbers. As you may recall, we had to re-bates number the documents.

The 25 documents you are referencing were produced to Jain in response to a FOIA request. I did not redact anything from those documents. It was done before your clients filed this lawsuit. We were merely producing the exact copy of what your clients received from the District in response to the FOIA. The full, non-redacted copies of the materials responsive to your client's FOIA are in our privilege log. So the documents are bates numbered. Please provide me with the bates number if you want it included.

I don't know what the 302 documents you're referencing. You submitted over 300 to me. Our litigation support group found that around 20 were duplicative. So it's down to 280. I don't know where you're getting your numbers from, and I also don't know which documents you eliminated because you haven't provided me with the bates numbers. I am responsible for producing this to Magistrate Schenkier because Lucy is gone today and you have a doctor's appointment. So, this is information I need to know. I also need to know how many documents outside the 280 you are challenging privilege on and your bases for privilege.

I understand you are ill. The timing is not great and I hope everything goes well today. But, we need this information. If we don't have it, I'll just put in the report that you had a doctor's appointment today and could not provide the required information to defense counsel and that you'll provide it at a later date.

Kate Schnake
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